

# Sills Cummis & Gross

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August 1, 2023

**VIA EMAIL**

Magistrate Judge Douglas E. Arpert  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street Room 2020  
Trenton, NJ 08608  
dea\_orders@njdcourts.gov

**Re: *United States v. Sahni*, Cr. No. 23-118 (GC):  
Motion Seeking Permission to Travel**

Dear Judge Arpert:

We are writing seeking permission for Dr. Harsha Sahni to travel to Greece in mid-August. We have contacted both the Government and Pretrial Services ("PTS") regarding Dr. Sahni's request to travel, and each has consented to Dr. Sahni's request.

On February 16, 2023, Dr. Sahni entered a plea of guilty before Judge Castner, pursuant to a plea agreement with the Government. Following the plea hearing, Dr. Sahni appeared before Your Honor for a bail hearing, at which You released Dr. Sahni on a \$500,000 bond, with conditions. *See* Docket Entry 9. Among the conditions ordered were: (i) Dr. Sahni shall report to PTS as directed; (ii) Dr. Sahni's travel is restricted to the continental United States; and (iii) Dr. Sahni shall surrender her passport to PTS. Sentencing is scheduled for September 14, 2023.

Dr. Sahni respectfully requests permission to travel to Greece for two weeks in mid-August (from approximately August 9 to approximately August 23) to attend one brother's birthday celebration and accompany another brother to several medical appointments. Only Dr. Sahni's husband will be traveling with her; her sons will remain in the United States.

If granted permission to travel to Greece in mid-August, Dr. Sahni will coordinate with PTS to provide any information requested about her travel to Greece and to report to PTS as directed throughout the duration of the trip.

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Michelle A. Siedzik  
July 21, 2023  
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Thank You for Your Honor's consideration of this matter.

Respectfully,

/s/Joseph B. Shumofsky

Joseph B. Shumofsky

cc: Sophie Reiter, AUSA (via email)  
Todd Jones, PTS (via email)

This Court GRANTS Defendant Harsha Sahni's Motion Seeking Permission to Travel to Greece in mid-August. Defendant shall coordinate with PTS to provide any information requested about her travel to Greece and to report to PTS as directed throughout the duration of the trip. PTS shall provide the Defendant with her passport, as needed, for the purpose of this trip.

SO ORDERED

August 3, 2023



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Douglas E. Arpert  
United States Magistrate Judge